

DOCKET FILE COPY ORIGINAL

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.202(b),  
Table of Allotments,  
FM Broadcast Stations,  
(Quincy, Woodville, Monticello,  
and Perry, Florida)

) MM Docket No. \_\_\_\_\_

) RM- \_\_\_\_\_

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**PETITION FOR RULEMAKING**  
**AND**  
**REQUEST FOR MODIFICATION OF LICENSE**

Great South Broadcasting, Inc. ("Great South"), licensee of WXSJ(FM), Quincy, Florida, by and through counsel, and pursuant to §1.420 of the Commission's Rules, hereby respectfully requests the Commission to amend Section 73.202(b) of the Rules to: (a) delete Channel 268C2 at Quincy, Florida; (b) add Channel 268C2 to Woodville, Florida; (c) modify Great South's license for WXSJ(FM) to permit operation at Woodville, Florida; (d) substitute Channel 289C3 for Channel 270C3 at Monticello, Florida, and order WJPH(FM), Monticello, to operate on Channel 289C3; and (e) substitute Channel 221A for Channel 288A at Perry, Florida, and order WNFK(FM), Perry, to operate on Channel 221A. In support whereof, the following is shown.

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

### **Introduction**

1. Great South is the licensee of WXSJ(FM) which operates on Channel 268C2 at Quincy, Florida. Great South requests the Commission to delete Channel 268C2 from Quincy, and reallocate it to Woodville, Florida, and modify WXSJ's license to operate on Channel 268C2 at Woodville. This change is permissible under §1.420(i) of the Commission's Rules, which authorizes the Commission to modify the license or permit of an FM station to specify a new community of license where the amended allotment would be mutually-exclusive with the licensee's present assignment. See 47 C.F.R. §1.420(i).

2. As shown in the attached Technical Statement attached as Exhibit A, the allotment of Channel 268C2 to Woodville complies with the Commission's minimum distance separation requirements except for two stations.<sup>1</sup> The reallocation requires the substitution of FM Channels for two Florida communities. Channel 289C3 must be substituted for Channel 270C3 at Monticello, Florida, and the license of WJPH(FM) must be modified to operate on the new channel. In addition, Channel 221A must be substituted for Channel 288A at Perry, Florida, and the license of WNFK(FM) modified to operate on the new channel.<sup>2</sup> Great South has reached an agreement and obtained the consent of the licensees of WJPH(FM) and WNFK(FM) for these

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<sup>1</sup> The Technical Statement is incorporated herein by reference, and provides technical information about the Quincy/Woodville channel exchange.

<sup>2</sup> Since Great South is proposing to substitute Channel 221A at Perry, Florida, included in the Technical Statement attached as Exhibit A is a Noncommercial Preclusion Showing demonstrating that the proposed allotment of Channel 221A at Perry, Florida, will not preclude the institution of new noncommercial service on Channels 218, 219, 220.

proposed channel substitutions and has agreed to reimburse each licensee for the costs associated with the channel changes. Copies of the agreements are attached as Exhibits B and C.

**Southern's Proposal Complies With The Commission's  
Reallotment Policy**

3. In order for a licensee to change its city of license in a rule making proceeding, it must be shown that: (1) the channel changes are mutually-exclusive, and (2) the rule making must not deprive a community of an existing service representing its only local transmission service. In addition, the Commission has stated that, in making the determination of whether to amend the Table of Allotments, it would "take into account the totality of the service improvements resulting from a proposed change in community of license in determining whether an allotment proposal should be approved." See, Modification of FM and TV Authorizations (New Community of License), 4 FCC Rcd 4013 (1989). Great South believes its proposal is consistent with all aspects of the Commission's reallotment policy.

**The Quincy and Woodville Channels Are Mutually Exclusive**

4. The attached Technical Statement shows that the allotment of Channel 268C2 at Woodville, Florida, is mutually exclusive with the present allotment of Channel 268C2 at Quincy, Florida. See Technical Statement at ¶2. Therefore, the reallotment of Channel 268C2 to Woodville satisfies the first of the Commission's requirements.

**The Community of Quincy Will Retain Local Service**

5. The community of Quincy, Florida, will retain local service in the event WXSJ(FM) is authorized to relocate to Woodville. WWSD(AM) is licensed to

Quincy. WTPS(FM) is an outstanding construction permit (currently off the air) for Channel 264A at Quincy. Since Quincy will retain an AM station as well as a future FM facility, reallocation of Channel 268C2 to Woodville, Florida, will not deprive Quincy of its only local aural service.

**Allotment of Channel 268C2 To Woodville Will Result In  
First Full-Time Aural Service**

6. In addition to complying with the Commission's requirements concerning mutually-exclusivity and retention of local service, the totality of service improvements that will result from the reallocation of Channel 268C2 from Quincy to Woodville further demonstrates that the channel exchange would serve the public interest. The attached Technical Exhibit shows that Woodville is a Census Designated Place in southern Leon County with a 1990 Census population of 2,760 which has no local aural service. Woodville is not located in the Tallahassee Urbanized Area. (Neither is Quincy.) Therefore, the reallocation of Channel 268C2 will result in the initiation of first aural service to the community of Woodville, and Woodville is not charged with reception of aural service from those stations located within the Tallahassee Urbanized Area. The Commission's priorities for assigning FM allotments are set forth in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 (1982). They are: (1) first full-time aural service, (2) second full-time aural service (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). The reallocation of Channel 268C2 to Woodville will result in the first full-time aural service for that community and therefore the public interest will be greatly served under the Commission's FM priorities. Therefore, Great South's reallocation proposal fulfills each of the Commission's goals in fairly,

equitably and efficiently distributing frequencies pursuant to Section 307(b) of the Communications Act of 1934, as amended.

**Woodville Is Qualified as a Community for Allotment Purposes**

7. The following information is provided on the community of Woodville, Florida, to demonstrate that Woodville, a Census Designated Place, qualifies as a "community" for allotment purposes. As noted supra, Woodville is outside the Tallahassee Urbanized Area. Counsel is informed that Woodville has several civic organizations,<sup>3</sup> approximately 100 businesses, including a bank, two hardware stores, an automobile dealership, several auto parts stores, a grocery store, two cabinet stores and various other retail outlets. Woodville has its own post office, volunteer fire department, recreational park, elementary school and two voting precincts. Therefore, Woodville, Florida, has all of the "social, economic or cultural components" to qualify under the Commission's definition of a "community" for allotment purposes. Table of FM Allotments (East Hemet, CA, et al.), 67 RR 2d 146, 147 (1989).

**Expression of Interest**

8. Upon the reallocation of Channel 268C2 to Woodville, Florida, Great South will promptly file an application for modification of the license of WXHR(FM) so as to make the necessary changes to the station's facilities to specify Woodville, Florida, as its new community of license. Upon a grant of the modification application, Great South will promptly make the necessary changes to WXHR(FM) to complete the proposed change.

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<sup>3</sup> Men's Club, Woman's Club, Community Action Committee, Community Board and Historical Society.

### Conclusion

9. Great South has demonstrated that the reallocation of Channel 268C2 from Quincy to Woodville, Florida, will comply with the Commission's policy concerning changes to FM communities of license and that reallocation in this case will serve the public interest. Therefore, the above facts considered, Great South Broadcasting, Inc., respectfully requests that the Commission make the following changes to the FM

Table of Allotments:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Quincy, FL	264A, 268C2	264A <sup>4</sup>
Woodville, FL	---	268C2
Monticello, FL	270C3	289C3
Perry, FL	288A	221A

Great South also requests the Commission to modify the licenses of WXSX, WJPH and WNFK for operation on the channels proposed above.

Respectfully submitted,

**GREAT SOUTH  
BROADCASTING, INC.**

By. 

Gary S. Smithwick  
Shaun A. Maher

Its Attorneys

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Suite 510  
Washington, DC 20036  
(202) 785-2800

April 6, 1995

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<sup>4</sup> WWSD(AM) will remain licensed to Quincy, Florida.

**EXHIBIT A**

**TECHNICAL STATEMENT**

# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**PERMISSION FOR BROADCASTING**  
**SOUTHERN BROADCASTING COMPANIES, INC.**  
**ALLOCATE CHANNEL 26BC2**  
**MOOREVILLE, FLORIDA**  
**March 1995**

**TECHNICAL EXHIBIT**

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912-638-8028 • 202-393-5133 • FAX 912-638-7722



**PETITION FOR RELEASING**  
**SOUTHERN BROADCASTING COMPANIES, INC.**  
**ALLOCATE CHANNEL 268C2**  
**WOODVILLE, FLORIDA**  
**March 1995**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Southern Broadcasting Companies, Inc ("SBC"), licensee of radio station WXHR, Channel 268C2, Quincy, Florida. SBC is requesting the Commission amend §73.202(b) of its rules by reallocoting Channel 268C2 from Quincy, Florida, to Woodville, Florida, as that community's first local service. In order to effectuate the proposed change in community of license, it is also necessary to make two additional substitutions. SBC requests that Channel 289C3 be substituted for Channel 270C3 at Monticello, Florida, and WJPH be ordered to change channels. SBC also requests that Channel 221A be substituted for Channel 288A at Perry, Florida, and WNFK be ordered to change channels (the specific requests are outlined in detail below).

**CHANGING COMMUNITY OF LICENSE**

2. Woodville, Florida, is a Census Designated Place in southern Leon County with a population, according to the 1990 Census, of 2,760 persons. Woodville presently does not have any aural broadcast facilities licensed to the community. Woodville has several civic organizations.<sup>1</sup> Woodville has numerous businesses, including a bank, two hardware stores, an automobile

1) Men's Club, Woman's Club, Community Action Committee, Community Board and Historical Society.

dealership, a grocery store and various other retail outlets. Woodville has its own local post office and volunteer fire department. Woodville is not located in the Tallahassee Urbanized Area.<sup>2</sup> Further the removal of Channel 268C2 from Quincy will not deprive that community of its only local service since full-time AM station, WWSD, 1230 kHz, and WTPS (outstanding construction permit) will remain in Quincy. The allocation of Channel 268C2 at Woodville is mutually exclusive with the Channel 268C2 allotment at Quincy, Florida.

3. Channel 268C2 can be allotted to Woodville, Florida, at reference coordinates North Latitude 30° 18' 53" and West Longitude 84° 15' 57". This represents a site restriction 1.7 kilometers west of the community in order to avoid shortspacing WHJX-FM, Channel 268C, Brunswick, Georgia.<sup>3</sup> Exhibit #1 is a usable area study for Channel 268C2 at Woodville, Florida, and shows where a transmitter site could be located for the channel. Exhibit #2 is a \$73.207 spacing analysis which indicates that aside from the existing licensed facilities of WXSJ in Quincy, Florida, Channel 268C2 at Woodville complies with the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities. (It is assumed, however, that the frequency change for WJPH from Channel 270C3, Monticello, to Channel 289C3, Monticello, has been concluded.) From the reference site, a 3.16 mV/m contour will encompass all of Woodville, Florida.

2) Quincy, Florida, is not located in the Tallahassee Urbanized Area.

3) The Channel 268C2 reference coordinates for Woodville, Florida, are based on putting the reference site in as close proximity as possible to the new proposed community. This does not definitively indicate where the proposed station will be located.

4. Channel 289C3 can be allotted to Monticello, Florida, (in substitution for Channel 270C3) at reference coordinates North Latitude 30° 25' 05" and West Longitude 83° 50' 18". This represents a site restriction 14.2 kilometers south-southeast of Monticello. Exhibit #3 is a usable area study which shows where a transmitter site for Channel 289C3 could be located to meet the Commission's minimum distance separation requirements and provide service to Monticello. Exhibit #4 is an \$73.207 spacing study for Channel 289C3 at Monticello. From the reference site, Monticello will receive 3.16 mV/m service. (Exhibits #3 and #4 assume WNFK, Channel 288A, Perry, Florida, has been relocated to Channel 221A as outlined below.) The reference site for Channel 289C3 at Monticello is not the current application site for WJPH's C3 facilities on Channel 270C3 (near the Channel 270C3 allocation site). SBC has entered into an agreement with the licensee of WJPH to amend or modify its facilities to a site which complies with the Commission's regulations on Channel 289C3.

5. Channel 221A can be allotted to Perry, Florida, in substitution for Channel 288A at reference coordinates North Latitude 30° 06' 27" and West Longitude 83° 34' 00". This represents a site restriction 1.6 kilometers east-southeast from the community. Exhibit #5 is a usable area study which denotes where a transmitter site could be located for Channel 221A. Exhibit #6 is a \$73.207 spacing study which shows that Channel 221A can be allotted to Perry in compliance with the Commission's

minimum distance separation requirements. From the reference site, Channel 221A will provide greater than 3.16 mV/m service to Perry. The above noted reference site for Channel 221A at Perry is not the currently licensed site for WNFK. It is, however, the site at which there is a pending application to relocate WNFK, as requested in File #BPH-940930IZ. Since the reference site is not the current licensed site for WNFK, SBC has entered into an agreement with the licensee of WNFK in which they consent to the proposed change in channels and licensed transmitter site for WNFK.

#### **NON-COMMERCIAL PRECLUSION**

6. Since SBC is proposing to substitute Channel 221A for Channel 288A at Perry, Florida, SBC herein submits a non-commercial preclusion study to demonstrate the proposed allotment of Channel 221A at Perry will not preclude the institution of new non-commercial service on Channels 218, 219 or 220. The non-commercial study was conducted utilizing the procedures outlined in MM Docket #88-572. In conducting the study, a non-commercial preclusion radius (arc) was established to all existing or applied for non-commercial stations. This radius was determined by the greater of the sums of the protected and interfering contours of the proposed channel under study or the existing facility.<sup>4</sup> If a commercial licensed or applied for facility is a potential preclusion, the required spacing distance pursuant to §73.207 of the Commission's rules was utilized.

4) The actual licensed or applied for facilities were used for existing stations. Maximum contour distances were used for the channel under study.

### CHANNEL 218 PRECLUSION STUDY

7. All classes of stations on Channel 218 are currently precluded due to the protection radius from WFSQ, Channel 218C1, Tallahassee, Florida. Exhibit #7 shows the preclusion of Channel 218A by virtue of WFSQ. Due to the increase of the protection arc from WFSQ, Channels 218C3, 218C2, 218C1 and 218C are also precluded by WFSQ.<sup>5</sup>

### CHANNEL 219 PRECLUSION STUDY

8. All classes of stations on Channel 219 are currently precluded due to the protection radii of the following facilities; WFSQ, Channel 218C1, Tallahassee, Florida; WWET, Channel 219A, Valdosta, Georgia; and WJLF, Channel 219A, Gainesville, Florida. Exhibit #8 is the preclusionary study for Channel 219A and shows that the pertinent arcs from the three above noted stations eliminate any preclusion caused by the proposed Channel 221A allotment at Perry, Florida. As was the case for all classes of stations on Channel 218, the increased protection arcs from these three facilities are likewise a precluding factor for Channels 219C3, 219C2, 219C1 and 219C.<sup>6</sup>

### CHANNEL 220 PRECLUSION STUDY

9. The potential for non-commercial preclusions on Channel 220 differs slightly from the previous two channels studied. In

- 5) The protection arc for WFSQ completely encompasses the preclusionary arc of the proposed Channel 221A at Perry. Therefore, additional maps outlining the preclusionary effect on the remaining classes of stations on Channel 218 are not attached.
- 6) The various protection arcs from these three facilities completely encompass the preclusionary effect of the proposed Channel 221A at Perry. Therefore, additional maps on the preclusionary effect on Channel 219 are not submitted.

this case, there is a small amount of non-commercial preclusion on Channel 220A which will be caused by the allotment of Channel 221A at Perry. Attached as Exhibit #9 is a map for Channel 220A which indicates the area which would potentially be precluded from non-commercial service on Channel 220A by virtue of the allotment at Perry. A study has been conducted to determine if any of the communities within the preclusion area have populations in excess of 1,000 persons.<sup>7</sup> The study revealed no communities within the preclusion zone. Therefore, Channel 220A is not considered precluded by this proposal. Further, Channel 203A and Channel 215A are potentially available in this area.<sup>8</sup> Channel 220C3 is, however, precluded due a combination of the increased preclusion arcs from WFSQ, Channel 218C1, Tallahassee, WAHX, Channel 220A, Monticello, and WXJC, Channel 220C3, Crystal River, Florida, as demonstrated on Exhibit #10. Because of the increasing distances of the preclusionary arcs caused by these facilities, Channels 220C2, 220C1 and 220C are likewise precluded by these same facilities.

9. Therefore, SBC proposes the following changes to the Commission's Table of FM Allotments:

**Woodville, Florida**

**Present**

None

**Proposed**

268C2

- 7) In determining the towns or groupings within the preclusion area, the towns were identified and then referenced to the 1990 Census for the state of Florida. If the community contained less than 1,000 persons or was not listed, the town (or grouping) was not considered.
- 8) It should be noted the area in which this preclusion study is being conducted is encompassed within the Grade B contour of Channel 6 television station, WCTV, Thomasville, Georgia. The possible preclusionary impact of Channel 6 affects all non-commercial channels in this area.

Quincy, Florida

<u>Present</u>	<u>Proposed</u>
264A, 268C2	264A

Monticello, Florida

<u>Present</u>	<u>Proposed</u>
270C3	289C3

Perry, Florida

<u>Present</u>	<u>Proposed</u>
288A	221A

10. The foregoing Technical Statement was prepared on behalf of Southern Broadcasting Companies, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Data relating to FM facilities was extracted from the NTIA database as updated January 1995. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein.





**ALLOCATION STUDY FOR WOODVILLE, FLORIDA  
USING PROPOSED ALLOCATION SITE AS REFERENCE**

<b>REFERENCE</b>	<b>CLASS C2</b>	<b>DISPLAY DATES</b>
30 18 53 N		DATA 01-27-95
84 15 57 W	Current rules spacings	SEARCH 03-03-95
----- CHANNEL 268 -101.5 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WWSR	268C2	Quincy	FL	321.8	28.80	190.0	-161.20
LI CN	30 31 08	84 27 04	50.000 kW	145M	17.9	118.1	
Southern Broadcasting Companies, Inc. BLH-901016KB							
* ALOPEN	270C3	Monticello	FL	78.3	36.85	56.0	-19.15
AL N	30 22 56	83 53 26	0.000 kW	OM	22.9	34.8	
NM Docket # 92-232 - Reserved for WJPH							
WJPH.A	270C3	Monticello	FL	68.4	40.13	56.0	-15.87
AP SCN	30 26 52	83 52 39	25.000 kW	100M	24.9	34.8	
Mayflower Broadcasting Corp BPH-930616IG							
>From Channel 270A Per NM Docket #92-232							
* WJPH	270A	Monticello	FL	57.5	44.95	55.0	-10.05
LI CN	30 31 58	83 52 17	6.000 kW	76M	27.9	34.2	
Mayflower Broadcasting Corp BNLH-910319KE							
>To Channel 270C3 Per NM Docket #92-232							
WBJXFM	268C	Brunswick	GA	77.0	249.02	249.0	0.02
LI CN	30 49 17	81 44 13	100.000 kW	446M	154.8	154.8	
George R. Reed, Receiver BLH-890707KD							
ALOPEN	269C2	Trenton	FL	125.7	138.92	130.0	8.92
AL N	29 35 00	83 05 50	0.000 kW	OM	86.3	80.8	
93-118							
>Site Restricted - Reserved for WCWB Per NM Docket #93-118							
WAFT	266C1	Valdosta	GA	53.9	103.42	79.0	24.42
LI CN	30 51 50	83 23 39	100.000 kW	170M	64.3	49.1	
Christian Radio Fellowship, Inc. BLH-880205KC							
WYOO	267A	Springfield	FL	264.6	130.51	106.0	24.51
LI 2CN	30 12 12	85 36 57	5.200 kW	72M	81.1	65.9	
Randall R. Wahlberg BLH-930308KD							

**CHANNEL 268C2 SPACING STUDY**

\* NOTE : WJPH IS PROPOSED TO MOVE TO CH 268C3 AS PART OF THIS PROPOSAL.

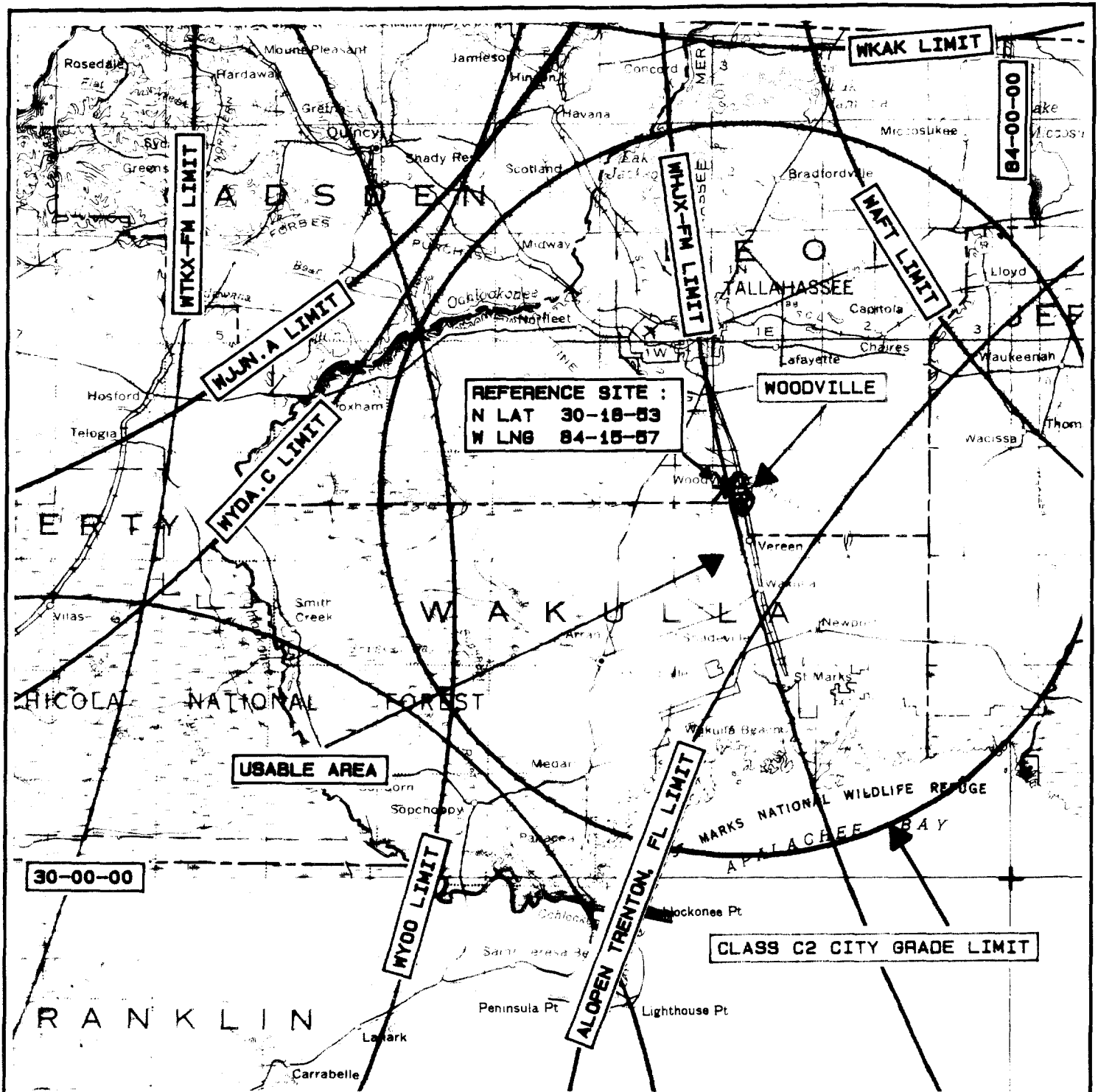
**EXHIBIT #2**

**PETITION FOR RULE MAKING  
SOUTHERN BCG CO., INC.  
ALLOT CHANNEL 268C2  
WOODVILLE, FLORIDA**

March 1995

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS



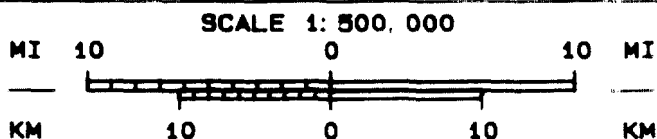
### CHANNEL 268C2 USABLE AREA

MAP IS A PORTION OF THE 1: 500, 000 SCALE  
U.S.G.S. BASE MAP OF FLORIDA

MAP ASSUMES WJPH ON CHANNEL 289C3 AT  
MONTICELLO, FLORIDA

EXHIBIT #1  
PETITION FOR RULE MAKING  
SOUTHERN BCG CO., INC.  
ALLOT CHANNEL 268C2  
WOODVILLE, FLORIDA

March 1995



GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR WOODVILLE, FLORIDA  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C2	DISPLAY DATES
30 18 53 N		DATA 01-27-95
84 15 57 W	Current rules spacings	SEARCH 03-03-95
----- CHANNEL 268 -101.5 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WXHR	268C2	Quincy	FL	321.8	28.80	190.0	-161.20
LI CN	30 31 08	84 27 04	50.000 kW	145M	17.9	118.1	
Southern Broadcasting Companies, Inc. BLH-901016KB							
* ALOPEN	270C3	Monticello	FL	78.3	36.85	56.0	-19.15
AL N	30 22 56	83 53 26	0.000 kW	OM	22.9	34.8	
MM Docket # 92-232 - Reserved for WJPH							
WJPH.A	270C3	Monticello	FL	68.4	40.13	56.0	-15.87
* AP ZCN	30 26 52	83 52 39	25.000 kW	100M	24.9	34.8	
Mayflower Broadcasting Corp BPH-930616IG							
>From Channel 270A Per MM Docket #92-232							
* WJPH	270A	Monticello	FL	57.5	44.95	55.0	-10.05
LI CN	30 31 58	83 52 17	6.000 kW	76M	27.9	34.2	
Mayflower Broadcasting Corpor BMLH-910319KE							
>To Channel 270C3 Per MM Docket #92-232							
WHJXFM	268C	Brunswick	GA	77.0	249.02	249.0	0.02
LI CN	30 49 17	81 44 13	100.000 kW	446M	154.8	154.8	
George R. Reed, Receiver BLH-890707KD							
ALOPEN	269C2	Trenton	FL	125.7	138.92	130.0	8.92
AL N	29 35 00	83 05 50	0.000 kW	OM	86.3	80.8	
93-118							
>Site Restricted - Reserved for WCWB Per MM Docket #93-118							
WAPT	266C1	Valdosta	GA	53.9	103.42	79.0	24.42
LI CN	30 51 50	83 23 39	100.000 kW	170M	64.3	49.1	
Christian Radio Fellowship Inc. BLH-880205KC							
WYOO	267A	Springfield	FL	264.6	130.51	106.0	24.51
LI ZCN	30 12 12	85 36 57	5.200 kW	72M	81.1	65.9	
Randall R. Wahlberg BLH-930308KD							

**CHANNEL 268C2 SPACING STUDY**

\* NOTE : WJPH IS PROPOSED TO MOVE TO CH 289C3 AS PART OF THIS PROPOSAL

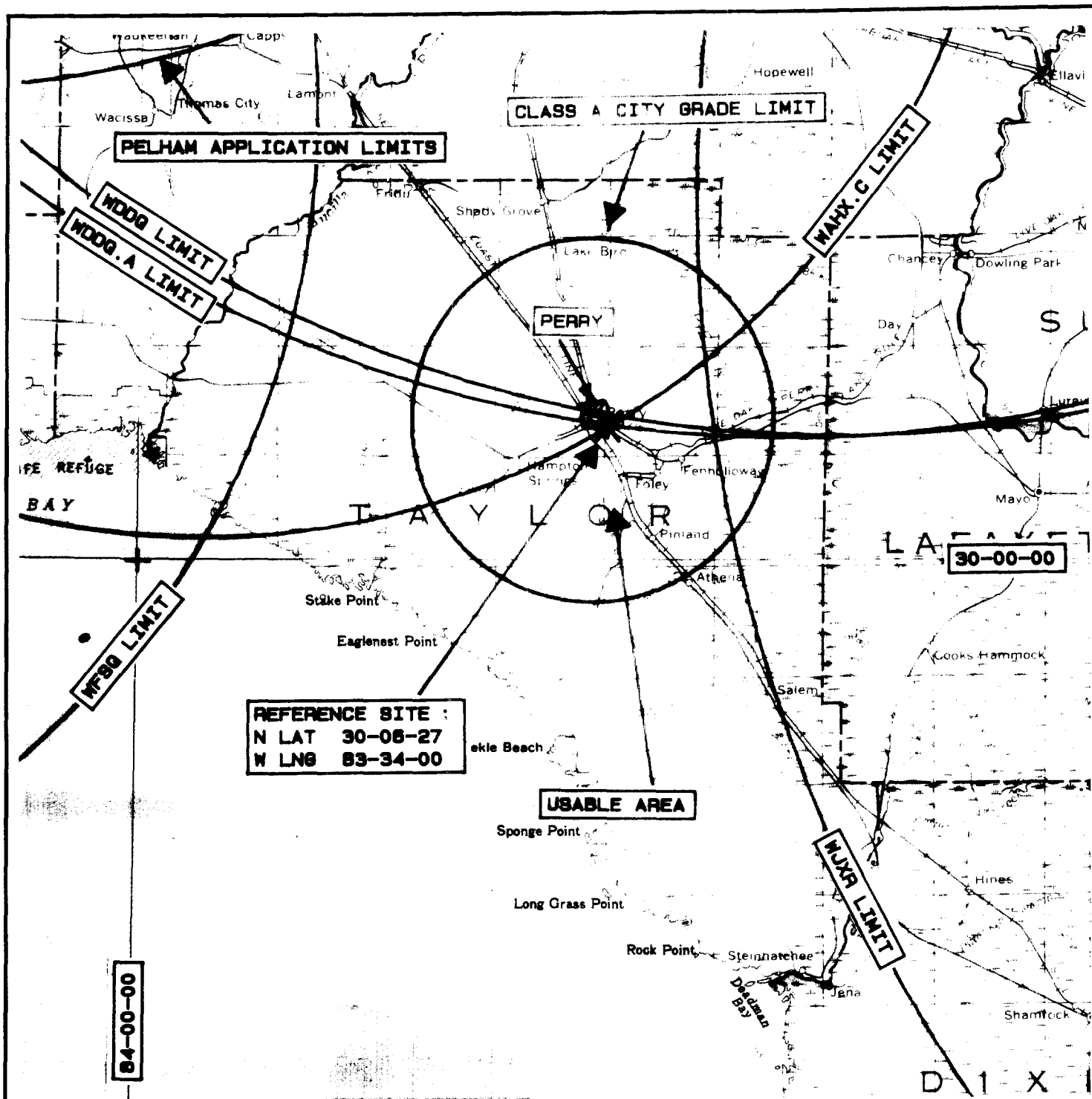
**EXHIBIT #2**

**PETITION FOR RULE MAKING  
SOUTHERN BCG CO., INC.  
ALLOT CHANNEL 268C2  
WOODVILLE, FLORIDA**

**March 1995**

**GRAHAM BROCK, INC.**

**BROADCAST TECHNICAL CONSULTANTS**



### CHANNEL 221A USABLE AREA

MAP IS A PORTION OF THE 1:500,000 SCALE  
U.S.G.S. BASE MAP OF FLORIDA

**EXHIBIT #5**  
**PETITION FOR RULE MAKING**  
**SOUTHERN BCG CO., INC.**  
**ALLOT CHANNEL 268C2**  
**WOODVILLE, FLORIDA**

March 1995

**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR PERRY, FLORIDA  
USING WNFK APPLICATION SITE/PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
30 06 27 N		DATA 01-27-95
83 34 00 W	Current rules spacings	SEARCH 03-03-95
----- CHANNEL 221 - 92.1 MHZ -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD221	221A	Perry	FL	0.0	0.00	115.0	-115.00
AD	30 06 27	83 34 00	0.000 kW	OM	0.0	71.5	
Southern Broadcasting Companies, Inc.							
> substitute Channel for WNFK Perry, Florida							
WAHX.C	220A	Monticello	FL	330.1	72.00	72.0	0.00
CP CN	30 40 13	83 56 26	6.000 kW	100M	44.8	44.8	
Nathan B. Stubblefield Fnd					BPED-930406MB		950915
WDDQ	221A	Adel	GA	8.2	115.37	115.0	0.37
LI CN	31 08 15	83 23 41	3.000 kW	91M	71.7	71.5	
Williams Investment Company					BLH-791009AG		
WDDQ.C	221A	Adel	GA	10.3	116.29	115.0	1.29
CP CN	31 08 22	83 20 57	4.200 kW	119M	72.3	71.5	
Williams Investment Company					BPH-910311IC		941123
WJXR	221C3	Macclenny	FL	81.9	150.88	142.0	8.88
LI CN	30 17 54	82 00 55	25.000 kW	100M	93.8	88.3	
WJXR, Inc					BLH-930218KB		
WFSQ	218C1	Tallahassee	FL	285.4	104.28	75.0	29.28
LI CN	30 21 29	84 36 39	100.000 kW	202M	64.8	46.6	
Florida State University					BLED-910829KH		
WIMV	274A	Madison	FL	24.0	54.69	10.0	44.69
LI CN	30 33 29	83 20 06	3.000 kW	100M	34.0	6.2	
New South Radio of Florida Inc					BLH-900529KC		

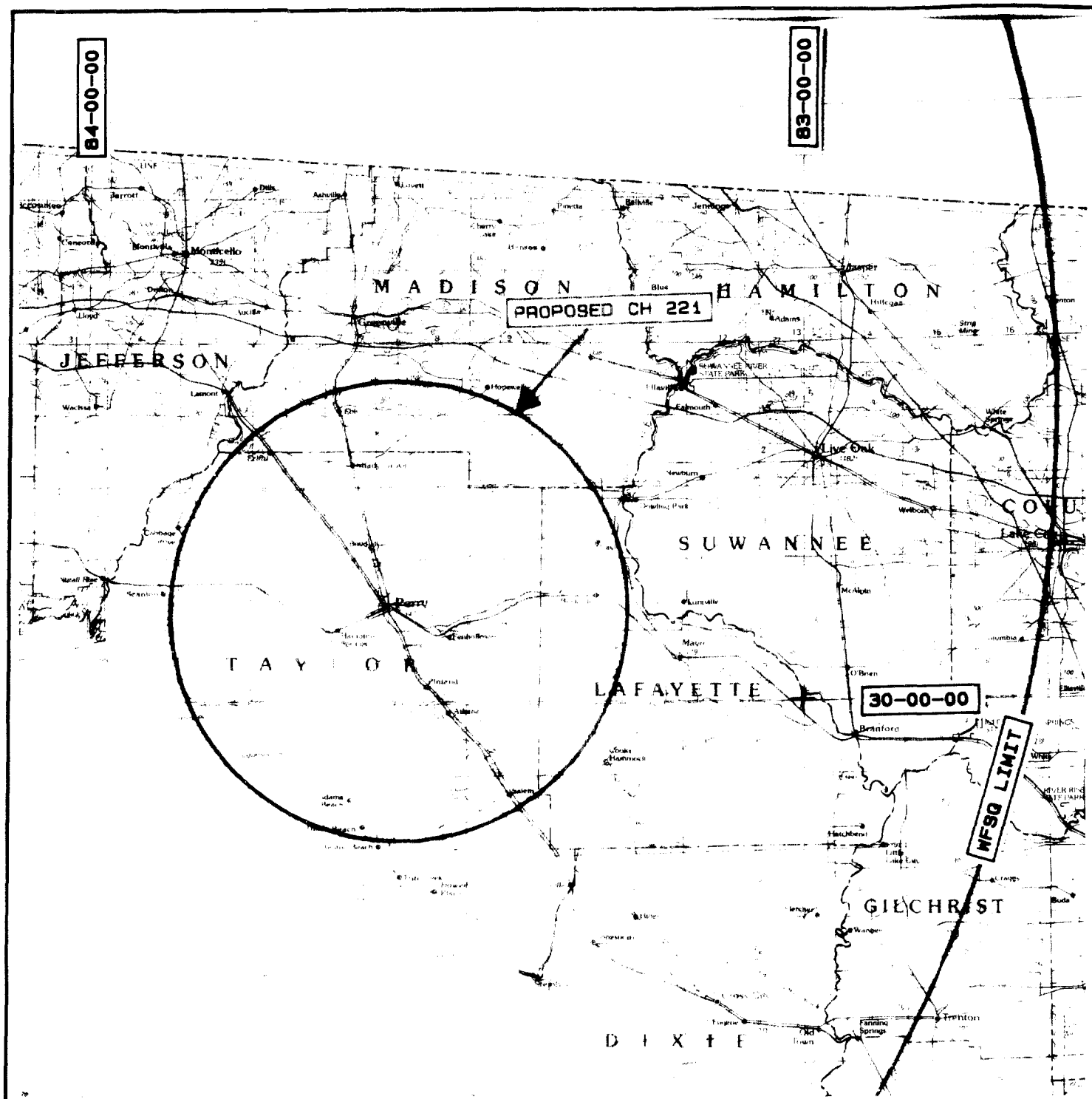
CHANNEL 221 SPACING STUDY

**EXHIBIT #6**  
**PETITION FOR RULE MAKING**  
**SOUTHERN BCG CO., INC.**  
**ALLOT CHANNEL 268C2**  
**WOODVILLE, FLORIDA**

March 1995

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS



# CHANNEL 218A PRECLUSION MAP

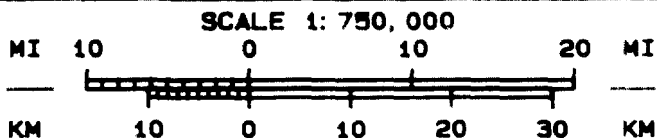
MAP IS A PORTION OF THE 1: 750, 000 SCALE  
U.S.G.S. BASE MAP OF FLORIDA

SEE EXHIBIT #7A FOR TABULATION OF  
STATIONS SHOWN ON EXHIBIT #7

## EXHIBIT #7

PETITION FOR RULE MAKING  
SOUTHERN BCG CO., INC.  
ALLOT CHANNEL 268C2  
WOODVILLE, FLORIDA

March 1995



# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

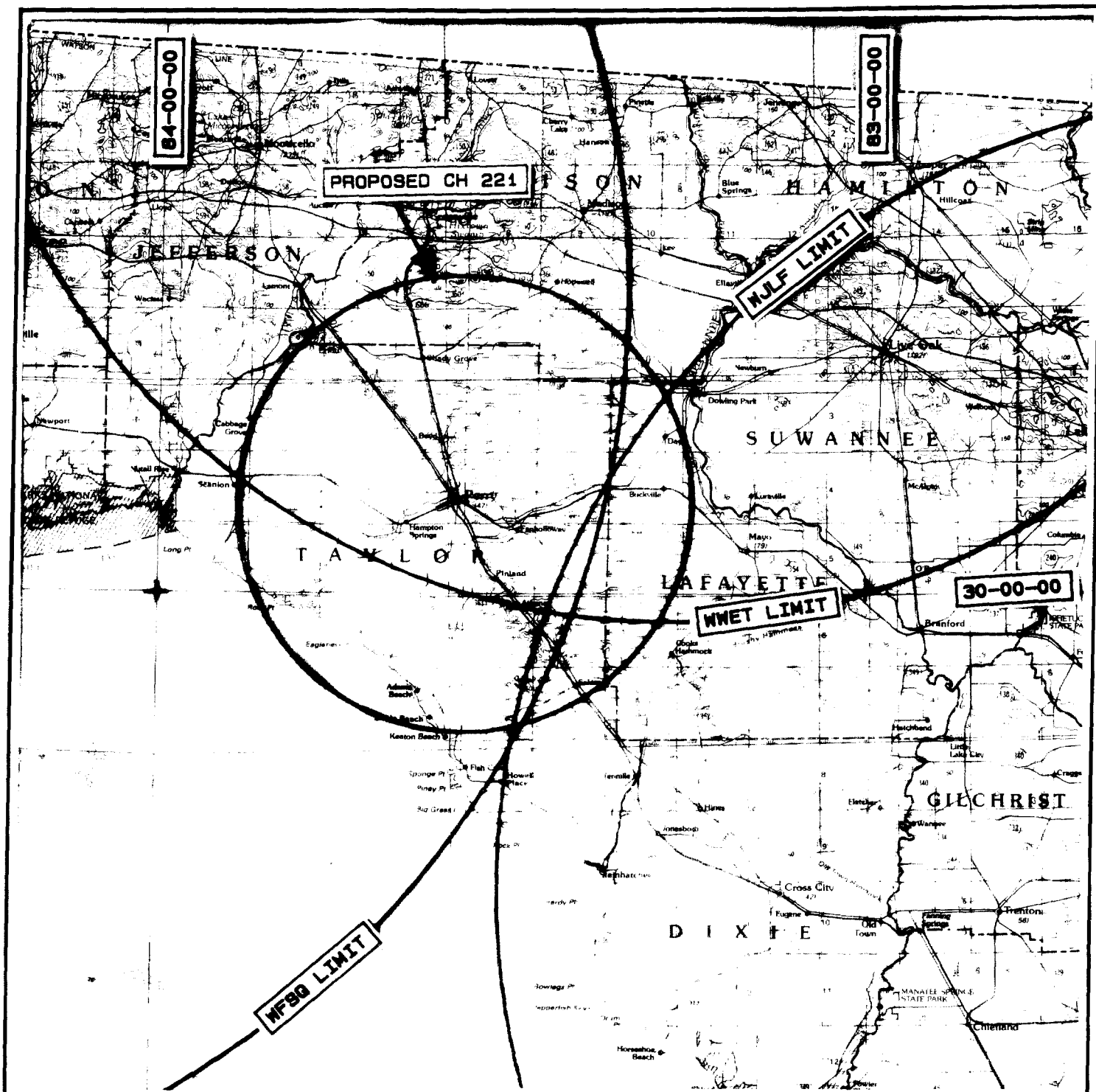
**PETITION FOR RULEMAKING**  
**SOUTHERN BROADCASTING COMPANIES, INC.**  
**ALLOCATE CHANNEL 268C2**  
**WOODVILLE, FLORIDA**  
**March 1995**

**EXHIBIT #7A**

**Stations Considered in Preclusion Study**  
**Channel 218A**

AD221A                      Channel 221A                      Perry, FL  
(Proponent)  
Preclusionary arc 31.0 kilometers

WFSQ                      Channel 218C1                      Tallahassee, FL  
100.0 kilowatts                      202 meters HAAT  
Preclusionary arc 190.3 kilometers



# CHANNEL 219A PRECLUSION MAP

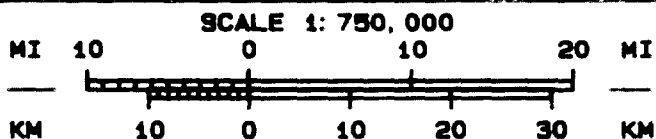
MAP IS A PORTION OF THE 1: 750, 000 SCALE  
U.S.G.S. BASE MAP OF FLORIDA

SEE EXHIBIT #8A FOR TABULATION OF  
STATIONS SHOWN ON EXHIBIT #8

## EXHIBIT #8

PETITION FOR RULE MAKING  
SOUTHERN BCG CO., INC.  
ALLOT CHANNEL 268C2  
WOODVILLE, FLORIDA

March 1995



GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS



**PETITION FOR RULEMAKING**  
**SOUTHERN BROADCASTING COMPANIES, INC.**  
**ALLOCATE CHANNEL 268C2**  
**WOODVILLE, FLORIDA**  
**March 1995**

**EXHIBIT #8A**

**Stations Considered in Preclusion Study**  
**Channel 219A**

AD221A                      Channel 221A                      Perry, FL  
(Proponent)  
Preclusionary arc 31.0 kilometers

WFSQ                      Channel 218C1                      Tallahassee, FL  
100.0 kilowatts                      202 meters HAAT  
Preclusionary arc 123.1 kilometers

WWET                      Channel 219A                      Valdosta, GA  
0.185 kilowatts                      72 meters HAAT  
Preclusionary arc 97.0 kilometers

WJLF                      Channel 219A                      Gainesville, FL  
2.0 kilowatts (DA)                      122 meters HAAT  
Preclusionary arc 106.7 kilometers<sup>1</sup>

1)                      The arc was based on the WJLF effective radiated power toward Perry (0.892 kw).